Remarks

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and the following remarks. Claims 1-20 are pending in the application. Claims 1-20 are rejected. No claims have been allowed. Claims 1, 11, and 17 are independent and have been amended.

Consideration of Previous IDSs

It appears the Examiner did not consider the first IDS filed with the present case, and missed a signature on the third submitted IDS. Both of the previously-filed IDSs are attached hereto as Exhibits A and B, respectively, for the Examiner's signature. The first IDS was filed with the application and was missing from the Examiner's Office Action. In the third IDS, the Examiner simply missed initialing one document listed under "Foreign Patent Documents".

Applicant kindly requests that the Examiner consider all references listed in the IDSs and initial all entries of the Form 1449s included with the IDSs.

Rejections under 35 U.S.C. § 101

The Action rejects claims 11-16 under 35 U.S.C. § 101 as allegedly directed toward non-statutory subject matter. Applicants respectfully traverse this rejection.

Applicant has amended claim 11 to include the word "apparatus". Applicant is claiming a machine, not solely a computer program. Therefore, claims 11-16 are clearly directed to patentable subject matter. (*See* MPEP § 2106.)

Claim Rejections under 35 USC § 102

The Action rejects claims 1-3, 7, 10-13, 16-17, and 20 under 35 USC § 102(b) as being anticipated by Pino et al. Applicants respectfully submit the claims are allowable over the cited art. For a 102(b) rejection to be proper, the cited art must show each and every element as set forth in a claim. (*See* MPEP § 2131.01.) However, the cited art does not describe each and every element. Accordingly, Applicants request that all rejections be withdrawn.

There are numerous deficiencies with Pino et al. First, Pino describes a way to simulate digital signal processing (DSP) portions of a circuit in a method called TSDF. TSDF provides a

"backplane on which synchronous DSP portions can be cosimulated with the analog RF portions of the design." (*See* Pino, page 1710, second column, 2nd full paragraph.) Thus, Pino is focused on the interaction between DSP (i.e., digital) and RF. There is <u>no</u> discussion in Pino of a circuit including a first set of nodes related to time-domain signals, which includes <u>analog signals</u>, and a second set of nodes related to time-frequency domain signals, which includes <u>RF signals</u>, as recited in amended independent claim 1. Thus, Pino's DSP/RF solution is different than the analog/RF solution of claim 1. Second, there is no disclosure in Pino of a "single simulation flow" for such signals, as recited by claim 1. Pino simply does not go into enough detail to know how it is implemented.

For at least these reasons, Pino does not describe each and every element of amended independent claim 1 as required by 35 USC § 102(b). Applicants therefore request that the Examiner's rejection of claim 1 be withdrawn.

Independent claim 17 was similarly amended and is allowable for at least the reasons stated above. Therefore, Applicants request that the Examiner's rejection of claim 17 be withdrawn as well.

Claims 2-3, 7, 10-13, 16, and 20 are dependent claims and are allowable for at least the reasons stated above. Dependent claims 2-3, 7, 10-13, 16, and 20 also recite independently patentable combinations of features. Accordingly, Applicants request that the Examiner's rejections of claims 2-3, 7, 10-13, 16, and 20 also be withdrawn.

Claim Rejections under 35 USC § 103(a)

The Action rejects claims 4-6, 14-15, and 19 under 35 U.S.C § 103(a) as being unpatentable over Pino in view of Li et al. The Action also rejects claims 9 and 18 under 35 U.S.C § 103(a) as being unpatentable over Pino in view of Gabele et al.

All claims rejected under 35 USC § 103(a) are dependent claims. Because the independent claims are allowable for the reasons stated above, dependent claims 4-6, 9, 14-15, 18, and 19 are also in condition for allowance. Dependent claims 4-6, 9, 14-15, 18, and 19 also recite independently patentable combinations of features. Accordingly, Applicants request that the Examiner's rejections of claims 4-6, 9, 14-15, 18, and 19 also be withdrawn.

Interview Request

If the claims are not found by the Examiner to be allowable, the Examiner is formally requested to call the undersigned attorney to set up an interview to discuss this application. This request is being submitted under MPEP § 713.01, which indicates that an interview may be arranged in advance by a written request.
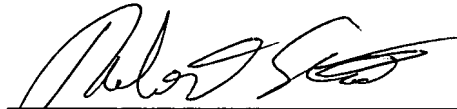
Conclusion

The claims in their present form should be allowable. Such action is respectfully requested.

Respectfully submitted,

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